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and the County of San Diego
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8 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **IN AND FOR THE COUNTY OF SAN DIEGO**

10 PEOPLE OF THE STATE OF CALIFORNIA)
ex rel. COUNTY OF SAN DIEGO AIR)
11 POLLUTION CONTROL DISTRICT; and)
COUNTY OF SAN DIEGO)

12 Plaintiffs)

13 v.)

14 MOHAMED AFCARI, individually and)
15 doing business as Master Plating; and DOES)
1 through 20, inclusive,)

16 Defendants.)
17
18)

No. GIC784868
Action Filed: March 18, 2002

SUPPLEMENTAL DECLARATION OF
ROBERT BLAISDELL, Ph.D., IN SUPPORT
OF PLAINTIFFS' REQUEST FOR
PRELIMINARY INJUNCTION AND
PERMANENT INJUNCTION

DATE: May 24, 2002
TIME: 2:00 p.m. (Telephonic)
Dept: 73
ICJ: Hon. S. Charles Wickersham
Trial: None Set

19 I, Robert J. Blaisdell, Ph.D., declare as follows:

20 1. I make this declaration based upon my own personal knowledge, except for
21 matters set forth herein on information and belief, and as to those matters, I believe them to be
22 true, and if called upon to testify herein, I could and would competently testify to the facts
23 contained herein.

24 2. I am employed as a Senior Toxicologist, at the State of California, Office of
25 Environmental Health Hazard Assessment (OEHHA). I previously submitted a declaration
26 dated March 16, 2002, in support of Plaintiffs' request for a temporary restraining order and
27 preliminary and permanent injunctions in this action. That declaration described my
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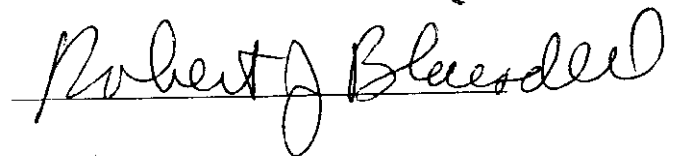
1 qualifications and my involvement in assessing the results of air monitoring for hexavalent
2 chromium performed by the California Air Resources Board (ARB) and the County of San
3 Diego Air Pollution Control District near two chrome plating facilities located on Newton
4 Avenue in the Barrio Logan area of San Diego.

5 3. Since the time of my prior declaration dated March 16, 2002, I have thoroughly
6 reviewed the results of the continued monitoring in and near the Master Plating chrome plating
7 facility on Newton Avenue; those results cover the period through April 19, 2002. The
8 increased risk of cancer mortality associated with the ambient concentrations of hexavalent
9 chromium measured in the December 2001 and February-April 2002 studies at 2121 Newton
10 Avenue, the residence next door to Master Plating, was calculated by ARB staff to be 140 in a
11 million. That is a level which risk managers would agree presents an unacceptably high risk.

12 4. Hexavalent chromium levels in the Newton Avenue neighborhood may have been
13 higher in earlier years when chrome plating was performed without any control measures.
14 Cancer risk is scientifically regarded as proportional to lifetime dose. Given the current and
15 potentially higher past exposures, and the range of risk indicated by the ARB monitoring data, it
16 would be a prudent public health measure to take immediate steps to reduce current exposure
17 and thus long term cancer risk.

18 I declare under penalty of perjury under the laws of the State of California that the
19 foregoing is true and correct.

20 Executed this 2nd day of May 2002, at Oakland, California.

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